

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

TIFFANY ROBINSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 08 C 185
	)	
H&R BLOCK ENTERPRISES, INC. and	)	Hon. Judge Guzman
HSBC BANK USA, NA,	)	Hon. Magistrate Judge Ashman
	)	
Defendants.	)	
	)	
	)	
	)	

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**UNOPPOSED MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c), Defendants, by their undersigned counsel, respectfully request that this Court enter the Agreed Order Regarding Confidentiality and Return of Documents, attached hereto as Exhibit 1. In support of this motion, Defendants jointly state as follows:

1. It is desirable for the parties in the litigation and their respective counsel to coordinate their efforts and to exchange information for purposes of prosecuting and defending claims asserted in this litigation, with a minimum of burden, expense, disputes, and delay.
2. In this litigation, the parties have sought and likely will seek documents and information that are non-public, privileged, confidential, trade secret, proprietary, financial or competitive information.
3. The parties have agreed upon the terms for an Order (attached as Exhibit 1) to protect such documents and information and to facilitate discovery in this case. Entry of this Order will minimize discovery disputes and facilitate the taking of depositions, thus

permitting discovery to proceed with less delay, expense and potential need for judicial intervention. The Order is not intended to expand the scope of information that may be treated as confidential under Fed.R.Civ.P. 26.

WHEREFORE, Defendants respectfully request that the Court enter the Agreed Protective Order attached to this Motion.

RESPECTFULLY SUBMITTED this 21st day of August, 2008.

By: /s/ Stacey R. Gilman

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**CERTIFICATE OF SERVICE**

I, Kevin M. Fee, Jr., an attorney, hereby certify that on August 21, 2008, I caused the foregoing Unopposed Motion for Entry of Agreed Order Regarding Confidentiality and Return of Documents to be served upon all counsel of record via ECF Notice of Filing.

/s/ Kevin M. Fee, Jr.